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REC

647 Welsh Road
Phila. Pa. 19115

James Seif, Regional Director
EPA Region III
841 Chestnut Street
Phila. Pa. 19107

AUG 2 1988

August 1, 1988

EPA REGION III
OFFICE OF REGIONAL ADMINISTRATION

Re: C&D Recycling

Dear Mr. Seif:

On various occasions I have:

1. expressed my concern about the shale pit's correlation to groundwater. EPA's response was somewhat contradictory and is unsatisfactory. Excavational investigation may be necessary to determine the depth to the abundantly fractured bedrock. There may be limited soil cover on the shale pit slopes but that doesn't alter the fact that a corrugated pipe discharged quenching fluids to the immediate vicinity. In all likelihood, the soil cover and shale have probably been seriously contaminated and may be releasing these contaminants into the aquifer during heavy periods of precipitation. (see attached identified statements)

2. requested that our shallow well, which has shown 190, 60 and 150 ppb's of lead be included in the sampling program. I am very concerned that this shallow well could possibly contaminate our drinking well, which is only 33 feet away, via migration through the fractured bedrock. There has been extensive mine blasting in the area. One recent blast blew out the windows of some buildings in Freeland. Past blasting has, on occasion, popped clocks and decorative items off our walls. I have even indicated the possibility of allowing this well (shallow) to be further developed for monitoring purposes - to no avail.

3. stated that although the Old Furnace windrose loci at the southern end of the C&D property is excellent and necessary; it is also not only highly desirable but necessary to use the Main Facility Building and the Pit directly behind it on the northern end as a loci point. Much open pit and uncontrolled stack burning took place before and after lead reclamation was supposedly discontinued. When these northern points are used to determine predominant wind deposition, the off-site sampling pattern changes drastically - Davis' field and our property. I understand and accept that much attention is being given to the southern end of C&D but the northern end is just as significant in determining deposition pathways. The wind pattern currently being used also needs to be updated to 1983/84. (see work plan)

4. asked that dust wipes and vacuum sweeper samples be taken for analyses as lead cannot be eliminated and in fact can be concentrated via normal household cleaning measures; and could possibly be causing an insidious and undetected danger to the residents, particularly children.

Be advised that I am not challenging EPA but do believe the Work Plan should be amended to include the above items as soon as possible. Please address each of the above separately.

Realizing certain circumstances are different at most sites I'd like an explanation of the following:

Lead concentrations at C&D have been documented 35 times higher than those at Marginal Battery (Throop, Pa.) The emergency response at C&D has consisted of a chainlink fence, fabric fencing, Visqueen covers, etc., yet acres of land are being diligently excavated in Throop. The surrounding neighborhood is also to experience earth removal, while off-site investigation at C&D appears to be being kept to a minimum.

Would you please explain why there is such a vast difference regarding the handling of these two sites? It's a well known fact that lead processing plants pollute for miles around. Both sites have the same Emergency Response coordinator.

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I am appalled by the continual circumlocution, errors, voids, arrogance and condescending manner utilized by some EPA employees. I have several letters and notes of conversations with various EPA individuals, in my possession, to substantiate this statement. Victims of environmental contamination are not the enemy but at times are treated as such when attempting to obtain reasonable explanations and answers. I would not like to think this type of behavior from public servants is a reflection of their superiors' attitudes. The only reason I am concerned about attitudes and actions of employees is their attitudes and inaction impede the progress of substantive factual action.

Finally, enclosed are copies of letters to and from Ms. Sinclair for your review and comment.

Your courtesy, interest and prompt response will be most appreciated. Thank you.

Sincerely,

Jane K. Sulima
Jane K. Sulima

Enclosures

CC: Lee Thomas
Congressman Paul Kanjorski
Senator John Heinz

J. Voltaggio

File

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MA 32. pg. 99 "Slopes adjacent to shale pit may have some limited soil cover, they do not provide representative surface soil sample locations". Please explain this. Metal quenching liquids were discharged through a corrugated pipe to vicinity of shale pit. Will EPA require these slopes and shale pit to be thoroughly investigated?

33. Could not the shale pit possibly be an extremely important conduit for surface contamination to invade the groundwater, especially since area displays rapid run-off and if we are experiencing intermittent contamination, particularly after heavy periods of precipitation? Please answer in detail. (see qus.#12 re: bedrock)

34. pg.99 May I have a copy of Figure 3-2 mentioned on page 99 before sampling begins?

35. pg.99 "Climate data regarding prevailing wind direction...1965 to 1974...". Why is data not up to and including 1984? Open pit burning as well as incineration continued into 1984.

2. Open burning and incineration continued till 1984. Open burning took place in a pit directly behind the main building till 1981, when Sulima woods were set afire via this activity. EPA was called by me and pit burning was moved elsewhere on the site. Why is this pit not mentioned?

3. Will this pit and surrounding area be included in the Work Plan and properly investigated? It should be part of the P.I.

4. The residential well was Sulima (pg.8 1/85) shallow well which showed 150 ppb's of lead. Why is it not included in the work plan as it may be an indicator of the shallow groundwater table? (see pgs. 14, 18 & 19 - well is N.W. of site)

36. pg. 132 Why is no decontamination of equipment necessary between home well samplings? If our shallow well is sampled, decontamination should be necessary. In a conversation with AT&T's attorney, John Williams, I requested this well be included for investigation. He seemed agreeable and said he'd mention this to the company and didn't foresee any problem.

43. Why are vacuum sweeper samples and dust wipes of homes not included in the Remedial Investigation Work Plan? Lead cannot be eliminated via ordinary household cleaning practices.

EPA

The slopes of the shale pit do not provide representative soil sample locations due to the limited soil cover and the slope which would make the safety requirements of obtaining a sample there quite excessive. The shale pit area of the site will be fully characterized via the data collected from sampling locations in and along the shale pit and Mill Hopper Creek which represents the outflow of this large drainage area. *Slope is approx. 25 to 30 ft steep + can be accessed on foot with a little effort*

The "Old Furnace" area on southern end of property appears to be the loci for the Windrose + that the C. & D. have been ignored as a loci for Windrose Bldg. was used as a "Smelter"

The climate data regarding prevailing wind direction was obtained for that time frame during which the burning activities at the site involved the materials known to contain lead. In addition, the more recent climate data has not yet been compiled for distribution.

Once again, the purpose of the PI is to investigate and fully determine the nature and extent of contamination existing at the site. If, at the completion of this study, we have found that contaminants have migrated from the site, additional investigation will be needed. At this point, however, we have no information or data which provides a rationale for EPA to conduct health surveys or obtain vacuum sweeper and dust wipe samples of the residential community. *If Contaminants - Action is not looked for it won't be found*

C & D was a smelter what about airborne deposition

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